

Q&A

DOGGR Submittal to State Legislature

1. *What does EPA consider to be the most significant findings in CA's Report to the Legislature?*

The most significant finding is one that builds on EPA's earlier finding regarding the Area of Review (AOR) evaluation. In its 2011 audit, EPA noted some issues related to the methodology used by DOGGR in this evaluation, however the Cypress Report concluded that the AOR evaluation was not being performed at all for the period between 2012 and 2104, in order for DOGGR to expedite permit issuance.

2. *Do the findings in DOGGR's Report to the Legislature impact the existing CA UIC Compliance Plan?*

Yes, and we are reviewing the extent of this impact. We are working with the State to ensure that the agreed upon compliance plan is executed in a way that emphasizes the highest priorities first. The compliance plan will then be updated to reflect these priorities.

3. *In light of these new findings and the State's admission of improper program implementation, is EPA considering revoking UIC primacy?*

*EPA is committed to ensuring that the UIC program reforms, identified in DOGGR's Renewal Plan will be implemented successfully so that revocation of the program would not be necessary. We are working with DOGGR to support their efforts and we will be providing on going federal oversight of the program.*

4. *For projects and injection wells that were approved without an AOR analysis, shouldn't those injection wells be shut-in until the State completes the analysis and can demonstrate zonal isolation?*

*The State is assessing which injection wells are operating that have not undergone a robust AOR analysis. If these wells are at risk, they will be re-evaluated and shut in if no zonal isolation can be demonstrated.*

5. *Was EPA aware of the extent of mismanagement within the CA UIC program?*

EPA was aware of the State's internal review being conducted on the Cypress District, but we were only just provided with the Cypress Report which we are reviewing.

6. *If EPA is supposed to be overseeing the State's UIC Program, how could all of these problems described in the Report happen?*

EPA has been performing oversight of the State's UIC program and performed a detailed audit in 2011. Since that time we have been engaged with the State to enact meaningful reforms and improvement. We will continue in this role and have made provisions to bolster our oversight. The findings of the Cypress Report revealed that while directives were issued by DOGGR HQ, such as the Letter of Expectations, the districts disregarded these in practice.

7. *Do all the injection wells in the state leak?*

DOGGR is on track to conduct additional well inspections and oversight of well testing to ensure protection of drinking water supplies.

8. *How do I know if my water supply has been adversely affected by the State's mismanagement of the UIC program for the last 30 years?*

EPA and the Water Board have extensive monitoring requirements for drinking water. All public drinking water is subject to strict monitoring and reporting. If there were contaminants found in public water supplies, you would have already been notified.